

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

WEI FU,

Defendant.

CR. NO. 3:24-CR- 171

(Judge Mannion)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

18 U.S.C. § 2252(a)(2)

(Distribution of Child Pornography)

FILED
SCRANTON

JUL 09 2024

PER

DEPUTY CLERK

On or about January 8, 2024 through January 9, 2024, in
Lackawanna County, in the Middle District of Pennsylvania and
elsewhere, the defendant,

WEI FU,

knowingly distributed a visual depiction, specifically an image with the
file name, "felixxx_062205vg_20050601082847R.jpg," which depicts an
adult female orally penetrating the vagina of a female infant
approximately three to six months old, using any means and facility of
interstate and foreign commerce, and that had been mailed and shipped

and transported in and affecting interstate and foreign commerce by any means, including by computer, the production of which involved the use of a minor engaged in sexually explicit conduct, and the visual depiction was of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

FORFEITURE ALLEGATION

The allegation contained in Count 1 of this Indictment is hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense in violation of Title 18, United States Code, Sections 2252(a)(2), the defendant,

WEI FU

shall forfeit to the United States of America:

- a. Any visual depiction described in Title 18, United States Code, sections 2251, 2251A, or 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which

was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;

- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

The property to be forfeited includes, but is not limited to, the following:

- a. a Lenovo Thinkpad, bearing serial number PC-09V99D;
- b. a silver hard drive, bearing serial number ZL203YCS; and
- c. a silver hard drive, bearing serial number ZJV01ALG.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

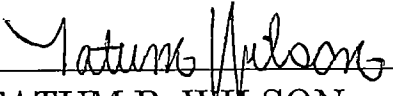
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All pursuant to Title 18, United States Code, Section 2253.

GERARD M. KARAM
United States Attorney

A TRUE BILL


FOREPERSON


TATUM R. WILSON
Assistant United States Attorney

7-9-24
Date